

In re:)	Case No. 5:22-02273 (MJC)
BETH LOUISE FREY)	Chapter 13
ARJAY B. FREY)	
)	
)	<u>OBJECTION TO CONFIRMATION</u>
)	
)	

A. The proposed interest rate of 4.5% is too low. GM Financial is entitled to be paid the prime rate of interest plus an increase for risk of loss. In Re Till. The prime interest rate at the time of the Debtors' filing was 7.0%. GM Financial objects to the Debtors' Plan unless the Debtors pay an interest rate of 9.0% on the \$24,939.00 over the life of the Plan (60 months) in order to adequately protect GM Financial for any risk of loss.

B. The Plan as proposed also violates §1326(a)(1) since it does not provide for payment to GM Financial of adequate protection payments. Adequate protection payments should be made to GM Financial beginning December of 2022 at \$195.00 per month, being 1.0% of the vehicle value. Payments should be made within thirty (30) days of filing and should continue up to and after confirmation, until regular payments are to be commenced through the Plan to GM Financial. Adequate protection payments to GM Financial should be given super priority administrative expense status and in all events must be paid prior to payment of any counsel fees to Debtors' attorney.

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C. GM Financial must retain its lien on the vehicle until such time that the Debtors
complete their chapter 13 Plan and receive a discharge.

/s/ William E. Craig
William E Craig, attorney for
AmeriCredit Financial Services, Inc.
dba GM Financial

Dated: 12/20/22